

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

TERRY ROBINSON, Individually and on Behalf of
The Wrongful Death Beneficiaries of DENNIS EARL HOLMES,
Deceased PLAINTIFF

VS. CIVIL ACTION NO.: 3:10 cv 629 CWR-LRA

THE TOWN OF WALNUT GROVE; WALNUT
GROVE CORRECTIONAL AUTHORITY; CORNELL
COMPANIES INC., GEO GROUP; WALTER (Brick) TRIPP
JOHN DOE, 1-5; and JOHN DOE CORPORATIONS, 1-5 DEFENDANTS

MOTION FOR EXTENSION OF TIME

COMES NOW the Plaintiff, Terry Robinson, individually and on behalf of the wrongful death beneficiaries of Dennis Earl Holmes, deceased, by and through the undersigned counsel, and moves the Court for an order extending time in which to file her response to Defendant Health Assurance, LLC's Motion for Summary Judgment [Docket Entry 38], and would should unto the court the following:

1. On September 19, 2011 Defendant Health Assurance, LLC filed with this Court its Motion for Summary Judgment.
2. Plaintiff's counsel asked counsel for Defendant Health Assurance if he would object to an extension until October 17, 2011 to respond to Defendant's Motion for Summary Judgment. Counsel for Defendant Health Assurance, LLC agreed.

3. Plaintiff's counsel requests an extension of time up to and including October 17, 2011 to file a response to Defendant Health Assurance, LLC's Motion for Summary Judgment. The requested extension is not for purposes of delay and will not prejudice the Defendant.

4. Defendant's counsel has advised Plaintiff's counsel that he does not object to this extension.

5. Plaintiff requests that the requirement of a separate memorandum be waived.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests an order extending the time to file a response to Defendant Health Assurance, LLC's Motion for Summary Judgment until October 17, 2011.

Respectfully submitted,

BY: s:/Earle S. Banks, Esq.

Earle S. Banks, Esq. MSB# 1732
Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Earle S. Banks., hereby certify that a true and correct copy of the foregoing Motion has been served electronically via the ECF system to the following:

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Counsel for Defendant, Walnut Grove Correctional Authority, Cornell Companies, Inc., GEO Group, and Walter "Brick" Tripp

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Counsel For Defendant, Health Assurance, LLC

This the 3rd day of October, 2011.

BY: s:/Earle S. Banks, Esq.
Earle S. Banks, MSB # 1732